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REMARKS

Claims 1 to 17 were pending in the application at the time of examination. Claims 1 to 17 stand rejected as anticipated.

Applicants note that in the prior response, Applicants stated:

> Prior to consideration of the pending action, Applicants note that on July 24, 2003, a "Request to Amend Typographical Error in Priority Claim," was filed by first class mail in the U.S.P.T.O. A return receipt postcard was received date stamped July 28, 2003 by the U.S.P.T.O. indicating that the paper was received. As of this date, a response to this paper has not been received and the pending action fails to mention the paper. The Examiner is respectfully requested to inform Applicants of the status of the paper and whether it has been entered in the file and the typographical error in the priority date fixed.

The Final Office Action did not provide a response to this request. Accordingly, Applicants respectfully repeat the above request.

Claims 1 to 17 remain rejected as being anticipated by Turbo C++ Version 4.5, Borland International, 1995 hereinafter referred to as Borland. In sustaining the rejection, the Examiner stated in part:

> . . . For example, Borland page 14 shows that a user has directly assigned a "bold" attribute to text of type integer. Since Borland is a C/C++ editor, the skilled artisan is cognizant that Borland's "integer" means the "int" keyword in the C/C++ language, therefore, when Borland see "int", it automatically transforms the textual keyword to "int". An int keyword can be fairly interpreted as an object.
>
> . . . It is noted that a user on Borland page 14 can apply bolding to an integer(the "int" keyword). Borland remembers (and references) this for future conversion. When Borland detects the word "int" in a document, it knows that the user has assigned (referenced) an attribute

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to it. Borland sees said attribute references as a "bold" conversion style element, therefore uses said reference to change "int" to "int", accordingly.

Applicants thank the Examiner for the clarification of the rejection. Applicants respectfully submit, as discussed more completely below, that Borland as interpreted in the rejection teaches a fundamentally different process than the process recited in Claim 1.

According to the rejection, a user assigns a format to a particular keyword, and subsequently when that keyword is entered, Borland changes the format of the keyword based upon the format previously assigned to the keyword. Applicants' invention as recited in Claim 1 does not rely upon detecting the content of a particular object, i.e., the keyword in Borland.

Claim 1 first recites:

> detecting objects, in said computer-readable document, having directly-assigned attributes, wherein attributes in said directly-assigned attributes were assigned individually to objects by a user;

This element of Claim 1 has nothing to do with a particular text sequence, e.g., "int" in the rejection. The Examiner attention is called to Fig. 3B of Applicant's disclosure:

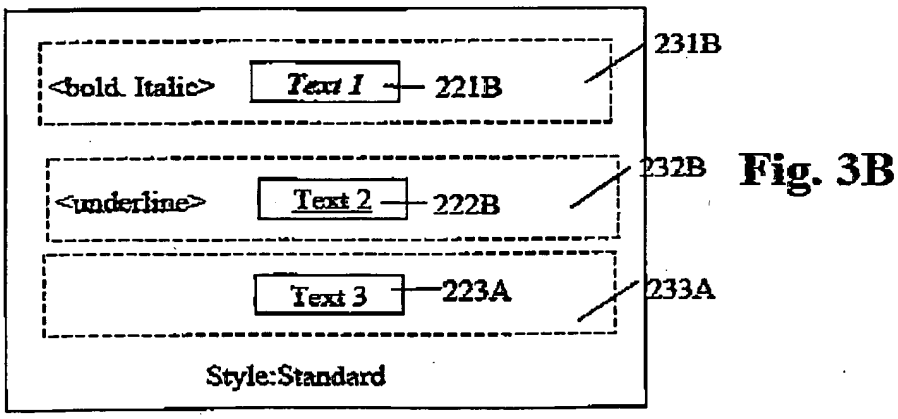

Fig. 3B

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The detection recited in the above quotation from Claim 1 is not directed to the content of a particular object, such as "Text1" and "Text2" in Fig. 3B or "int" in the rejection, but rather detecting objects that have "directly assigned attributes". In Fig. 3B, the directly assigned attributes are "<bold Italic>" and "<underline>" and so the objects with each of these directly assigned attributes are detected. Object "Text3" is not detected because it does not have a directly assigned attribute. Perhaps a more detailed example would be helpful. For example, consider,

```
<bold> int
       int
<bold> real
<italic> main
<italic bold> return
              floating point
```

In this example, the user has directly assigned attribute <bold> to both the first occurrence of "int" and "real," directly assigned attribute <italic> to "main," and directly assigned attribute <italic bold> to "return." (Note the entries used here and below are presented for discussion purposes and are not intended to indicate that particular representation would be used in the actual application of the invention of Claim 1.)

Thus, the detecting operation in Claim 1 would detect that the first occurrence of object int and object real have the same directly assigned attributes while objects main and return are there only objects having their particular directly assigned attributes, e.g.,

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Directly Assigned Attribute	Objects Detected
<bold>	first occurrence of int, real
<italic>	main
<italic>	return

Object "floating point" and the second occurrence of object "int" are not detected, because neither has a directly assigned attribute. Thus, unlike in the rejection as quoted above where the second occurrence of int was detected and changed, Claim 1 detects only objects having directly assigned attributes irrespective of the content of the object.

Next, Claim 1 recites:

> creating, automatically, a conversion style element for every detected combination of directly-assigned attributes in the computer-readable document

This element of Claim 1 has nothing to do with a converting a particular object to a particular format when that object is entered a subsequent time, e.g., bolding "int" in the rejection. In fact, if an object were entered a second time and did not have any directly assigned attributes, Claim 1 would not process the object, as shown above.

The Examiner attention is called to Fig. 3C of Applicant's disclosure:

//
//
//
//
//
//
//

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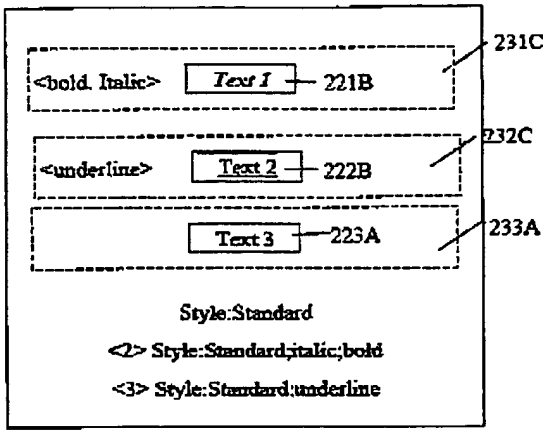

Fig. 3C

In Fig. 3C, the conversion style elements, which are created, are represented as <2> and <3> for the two directly assigned attributes, respectively, in Fig. 3B above. Notice that "conversion style elements" is not "converting", but creating a particular type of style element.

Applicants point out that "styles" are commonly used in computer document formatting (See Description of Related Art in Applicants' specification) and so a conversion style element would be interpreted by those of skill in the art as a particular type of style element. Applicants note that while the examiner is permitted to interpret claim limitations broadly, the MPEP puts specific bounds on such an interpretation. Specifically,

CLAIMS MUST BE GIVEN THEIR BROADEST REASONABLE INTERPRETATION

> During patent examination, the pending claims must be "given *>their< broadest reasonable interpretation consistent with the specification."

MPEP § 2111 8th Ed. Rev. 2, p 2100-46 (May 2004).

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> The broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach.
>
> MPEP § 2111 8th Ed. Rev. 2, p 2100-47 (May 2004).
>
> **>Claim terms are presumed to have the ordinary and customary meanings attributed to them by those of ordinary skill in the art.
>
> MPEP § 2111.01, II., 8th Ed. Rev. 2, p 2100-48 (May 2004).

Thus, Applicants respectfully submit that the interpretation used in the rejection is neither related to Applicants' claim language nor related to the interpretation that would be used by those of skill in the art.

Returning to the example presented above, the creating operation would generate three conversion style elements:

<a> Style; bold
<b> Style; italic
<c> Style; italic bold

A style element has been created for each combination of directly assigned attributes in the example. Again, this has nothing to do with remembering a particular formatting for the content of an object and applying that formatting each time that a new instance of that content is input as stated in the rejection.

Finally, Claim 1 recites:

> replacing directly-assigned attributes of each detected object by a reference to one conversion style element wherein said one conversion style element corresponds to said directly-assigned attributes

This element of Claim 1 does not recite that a new input object is reformatted as in the rejection. Rather, the detected objects are those detected by the first element of Claim 1 and the detected objects are not replaced with a formatted object,

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because the objects are already formatted by the "directly-assigned attributes." Rather, it is the "directly assigned attributes" of the detected objects that are replaced by "a reference to one conversion style."

The Examiner's attention is directed to Fig. 3E of the disclosure:

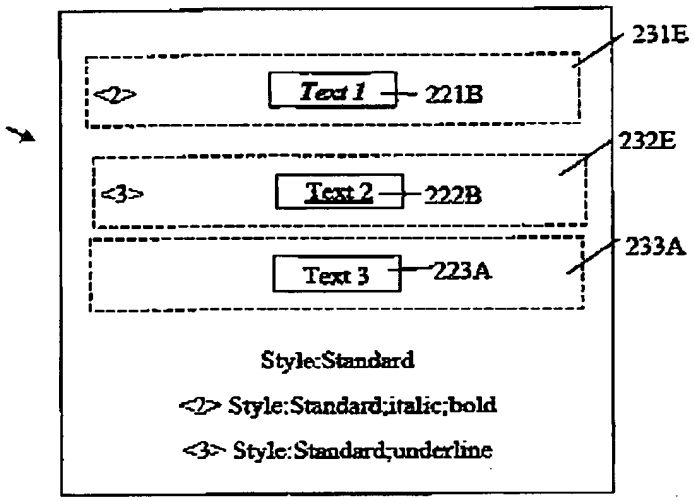

Fig. 3E

Here, the directly assigned attributes in Fig. 3B have been replaced by a reference <2>, <3> to the conversion style element. Nowhere does Claim 1 recite anything about processing objects input at a later time as was used in the rejection. Accordingly, the rejection shows that Borland as interpreted fails to teach the invention in the same detail as recited in the claims.

Finally, returning to the example above, the original directly assigned attributes were:

```
<bold> int
       int
<bold> real
```

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<italic> main
<italic bold> return
floating point

Following the replacing operation, this becomes:

<a> int
int
<a> real
<b> main
<c> return
floating point

This shows the difference between Borland as interpreted in the rejection and Claim 1, because no new entry is even considered. Moreover, the two occurrences of "int" are treated differently, because the first occurrence has a directly assigned attribute, while the second occurrence does not. Applicants respectfully submit that the Borland fails to teach the invention to the same level of detail as recited in Claim 1 and so fails to anticipate Claim 1. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 1.

Claims 2 to 6 depend from Claim 1 and so distinguish over Borland for at least the same reasons as Claim 1. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 2 to 6.

With respect to the anticipation rejection of Claim 7, the above comments with respect to Claim 1 are incorporated herein by reference. Moreover, changing or not changing a file extension fails to teach anything concerning converting "directly assigned attributes." Applicants request reconsideration and withdrawal of the rejection of Claim 7.

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Claim 8 stands rejected on the same basis as Claim 1. The above concerning Claim 1 and Borland are applicable to Claim 8 and are incorporated herein by reference. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 8.

Claims 9 to 13 depend from Claim 8 and so distinguish over Borland for at least the same reasons as Claim 8. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 9 to 13.

Claim 14 stands rejected on the same basis as Claim 1. The above concerning Claim 1 and Borland are applicable to Claim 14 and are incorporated herein by reference. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 14.

Claims 15 to 17 depend from Claim 14 and so distinguish over Borland for at least the same reasons as Claim 14. Applicants request reconsideration and withdrawal of the anticipation rejection of each of Claims 15 to 17.

Claims 1 to 17 remain in the application. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence is being facsimile transmitted to the U.S. Patent and Trademark Office, Fax No. (703) 872-9306, on June 6, 2005.

Rivkah Young
Rivkah Young

June 6, 2005
Date of Signature

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